

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

Master File 06-MD-1775 (JG) (VVP)

**ORAL ARGUMENT WILL BE ON A
DATE AND AT A TIME TO BE
DESIGNATED BY THE COURT**

THIS DOCUMENT APPLIES TO:
ALL ACTIONS

**NOTICE OF JOINT MOTION FOR PARTIAL SUMMARY
JUDGMENT WITH RESPECT TO PLAINTIFFS'
SECURITY SURCHARGE CLAIMS BY DEFENDANTS**

PLEASE TAKE NOTICE THAT defendants Atlas Air Worldwide Holdings, Inc., Polar Air Cargo, LLC, Polar Air Cargo Worldwide, LLC, Air China, Inc., Air China Ltd., Air India, Ltd., and Air New Zealand, Ltd. (together "Defendants"), pursuant to Rule 56 of the Federal Rules of Civil Procedure, hereby jointly move for partial summary judgment on Plaintiffs' security surcharge claims against Defendants in Plaintiffs' First Consolidated Amended Complaint, and for such other and further relief as the Court deems just and proper. The grounds for the motion are set forth in more detail in the Defendants' accompanying Memorandum of Law in Support of its Motion for Summary Judgment on Plaintiffs' Security Surcharge Claims and the supporting declarations and exhibits.

Oral argument on the Defendants' motion shall be on a date and at a time to be designated by the Court.

Date April 24, 2015

Respectfully submitted,

/s/ Harvey J. Wolkoff

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CERTIFICATE OF SERVICE

I, David A. Young, hereby certify that on April 24, 2015, a true and correct copy of the foregoing motion was served on the following via ECF:

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